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November 29, 2021

BY ECF

The Honorable Ann M. Donnelly
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Henkin, et al. v. Qatar Charity, et al.*, 1:21-cv-05716-AMD-VMS

Dear Judge Donnelly:

Counsel for Masraf Al Rayan (“MAR”) writes pursuant to Rule 2.F of Your Honor’s Individual Practices and Rules, and with Plaintiffs’ consent, to request an enlargement of time to respond to the Complaint until January 31, 2022.

On November 28, 2021, Plaintiffs requested a determination of relatedness, pursuant to Rule 50.3.1 of the Guidelines for the Division of Business Among District Judges, Eastern District of New York (“the Guidelines”), for this case (ECF No. 21) and two other actions, *Force, et al. v. Qatar Charity, et al.*, No. 1:20-cv-02578-BMC, and *Przewozman, et al. v. Qatar Charity, et al.*, No. 1:20-cv-06088-NGG-RLM (ECF No. 29). In the latter action, the Court has agreed to extend the deadline for MAR’s response to the Complaint to January 31, 2022.¹ Accordingly, MAR respectfully requests an extension to allow time for the judicial determination of relatedness of these actions and to provide MAR, a foreign defendant, sufficient time to respond to the allegations in the Complaint. Pursuant to Rule 50.3.1(d) of the Guidelines, MAR has until December 6, 2021 to file a response to Plaintiffs’ request for a judicial determination of relatedness in the *Henkin* and *Przewozman* actions.

This is MAR’s first request for an extension. This request would not have an impact on any other scheduled dates.

¹ Plaintiffs assert that MAR and Qatar National Bank were properly served in all three actions on November 8, 2021, allegedly triggering a response deadline of November 29, 2021. (ECF No. 19; *see also Przewozman, et al. v. Qatar Charity, et al.*, No. 1:20-cv-06088-NGG-RLM, ECF No. 25 at 1.)

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Respectfully submitted,

/s/ Carolina A. Fornos

Carolina A. Fornos

Aryeh L. Kaplan (*pro hac vice pending*)

Markenzy Lapointe (*pro hac vice pending*)

Counsel for Defendant Masraf Al Rayan

cc: All parties of record (by ECF)